

## **EXHIBIT D**

**Depositions**

1. Putnam 30(b)(6) deposition on accounting issues (David Boon, Divisional CFO and Head of Operations Finance, which creates the black books, and Stacy Mills, Corporate Controller) (taken 7/12/06)
2. Putnam 30(b)(6) deposition on black book process (David Boon, Divisional CFO and Head of Operations Finance) (taken 10/16/06)
3. Putnam 30(b)(6) deposition on cost accounting issues (David Boon, Divisional CFO and Head of Operations Finance) (taken 2/27/07)
4. David King, portfolio member, Putnam Fund for Growth & Income (taken 11/15/06)
5. Michael Abata, portfolio leader, Putnam Classic Equity Fund (taken 11/16/06)
6. James Wiess, portfolio leader, Putnam Investors Fund (taken 11/17/06)
7. Robert Ginsberg, portfolio leader, Putnam Voyager Fund and Putnam Growth Opportunities Fund (taken 1/24/07)
8. John Hill, Chairman of the Board of Trustees (taken 1/16/07)
9. Jameson Baxter, Chairman of the Contract Committee of the Board of Trustees (taken 1/26/07)
10. Richard Block, Putnam's Head of Trading (taken 1/23/07)
11. Patrick Quinn, Senior Financial Analyst, who Plaintiffs describe as having "had significant and meaningful involvement in the preparation of the black books and associated materials for each year except 2004" (taken 1/26/07)
12. Mitchell Fishman, Chief Administrative Officer, PRM (taken 2/1/07)
13. Sandra Whiston, head of Putnam's institutional business (taken 2/20/07)
14. Lipper, Inc., a provider of mutual fund research (taken 2/28/07)

\*Plaintiffs have permission to take 20 depositions.

**Documents**

- Over 390,000 pages produced to date, covering a more than 10 year period
  - Involved, in part, a review of approximately 2.3 million pages of e-mail, covering a 3.5 year period of time.
- Plaintiffs have served the following document requests:
  - Plaintiffs' first request for documents to Defendants, consisting of requests for 141 categories of documents
  - Plaintiffs' second request for documents to Defendants, consisting of requests for 38 additional categories of documents (Plaintiffs served this most recent request on January 11, 2007)
  - Plaintiffs' first document subpoena to Putnam Advisory Company, consisting of requests for 29 categories of documents
  - Plaintiffs' second document subpoena to Putnam Advisory Company, consisting of requests for 33 additional categories of documents (Plaintiffs served this most recent request on January 11, 2007)

**Other Discovery**

- Plaintiffs have served several additional subpoenas for documents, including:
  - thirteen Putnam institutional client subpoenas
  - eight subpoenas to Putnam Trustees
  - two subpoenas to Lipper, Inc.
  - a subpoena to Marsh & McLennan Companies, Inc.
  - a subpoena to Ropes & Gray (counsel to the Trustees)
  - over 90 public records requests to current and former Putnam institutional clients
- Plaintiffs served interrogatories on each Defendant, which resulted in 86 pages of responses
- Plaintiffs served 24 requests for admission seeking admissions about the admissibility of tens of thousands of pages.
- Since August 2006, the parties have exchanged more than 170 letters regarding discovery issues.